

# **Business Conduct Guide**

**2021**

**Uber**

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# We do the Right Thing. Period.

We reimagine the way the world moves for the better.

Each of us has a responsibility to treat each other respectfully and to grow our business with integrity as one uber. The Business Conduct Guide helps us achieve our goals by providing resources to answer legal and ethical questions.

If you have questions as you use the Guide, please reach out to the [Global Ethics and Compliance Team \(E&C\)](#)

We're here to help.

# Making the Right Decision

Use this framework to help make the right decision.

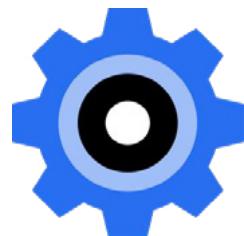


## Purpose

Why am I doing this?

Is it legal?

Is it the right thing to do?



## Process

Did I follow the right steps?

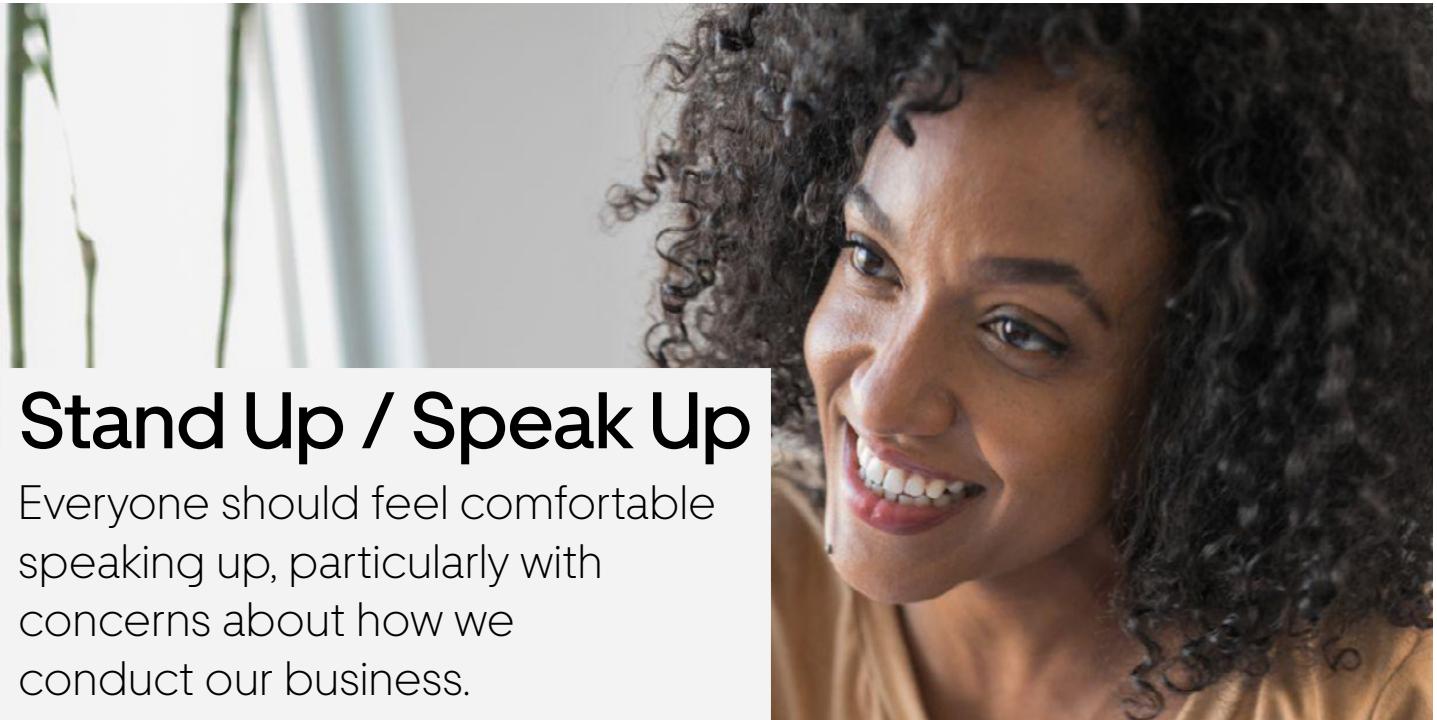
Did I consult the right experts?



## Perception

How does this look to users, regulators, employees, media?

How would this look three to four years in the future?



## Stand Up / Speak Up

Everyone should feel comfortable speaking up, particularly with concerns about how we conduct our business.

At Uber, we believe in doing the right thing. You are responsible for knowing and following the policies in this Business Conduct Guide which outlines appropriate business conduct and provides links to policies, resources and training to guide ethical decision-making when acting on behalf of Uber. Additionally, the [Global Employee Handbook](#) outlines policies and processes that must be followed with regard to employment laws, maintaining a respectful workplace, and standards of conduct to follow when interacting with colleagues.

It's important to raise questions if you are not sure what to do or if you have reason to think someone is not following our policies or the laws that apply to our business. We're better as a company when you exercise your power to prevent mistakes or wrongdoing. So [Stand Up and Speak Up](#) for yourself and for others.

Reach out to your manager first. Managers have a responsibility to foster an open-door environment where their team feels comfortable raising concerns and questions. If you cannot reach your manager, or if you are not comfortable raising the issue with your manager, reach out to the People Team, E&C, Legal, Internal Audit, or the [Uber Integrity Helpline](#), which is available 24 hours a day, 7 days a week. For the Helpline, while it is helpful for you to offer as much detail as possible in reporting your concern, in most regions, you may choose to remain anonymous.

If you are involved in an investigation as the subject or a witness, you must cooperate fully and respond to inquiries, interviews, and requests for documents, promptly, completely and truthfully. We do not tolerate retaliation against anyone who raises genuine concerns in good faith or who participates in an investigation.

# Great Minds Don't Think Alike

We are committed to fostering a diverse environment where ALL people are welcome and supported.

As a company that facilitates movement, our goal is to ensure that everyone can move freely, safely, and without fear. We also believe in being a place where employees work together towards something bigger. To do that, we must maintain an equitable and inclusive workplace, while also building a marketplace where our products and services address the needs of diverse communities.

Uber's culture is one where diversity of thought and expression makes us stronger. We believe in mutual respect and dignity for all, regardless of race, color, religion, gender, pregnancy (including childbirth) or related medical conditions, age, national origin or ancestry, physical or mental disability, marital status, medical condition, sexual orientation, gender identity and gender expression, or genetic information. Having a diverse workforce — made up of team members who bring a wide variety of skills, abilities, experiences and perspectives — is essential to our success. We are committed to the principles of equal employment opportunity, inclusion and respect.

Uber does not tolerate discrimination, harassment, retaliation, bullying, workplace violence, or other violations of our standards of conduct as outlined in the [Global Employee Handbook](#) and its local annexes.

At Uber, we believe it is essential to provide all employees with a respectful and safe working environment. If potential violations of workplace policy are reported, Uber will investigate and take appropriate steps to address them. If you experience, see or hear something that may be a violation of Uber's policy, you should [Stand Up and Speak Up!](#)

Uber provides a variety of channels to report concerns to enable review of your concerns. You may report:

- Directly to any Uber manager (including yours);
- Through [Ask HR](#); or
- To the [Integrity Helpline](#).

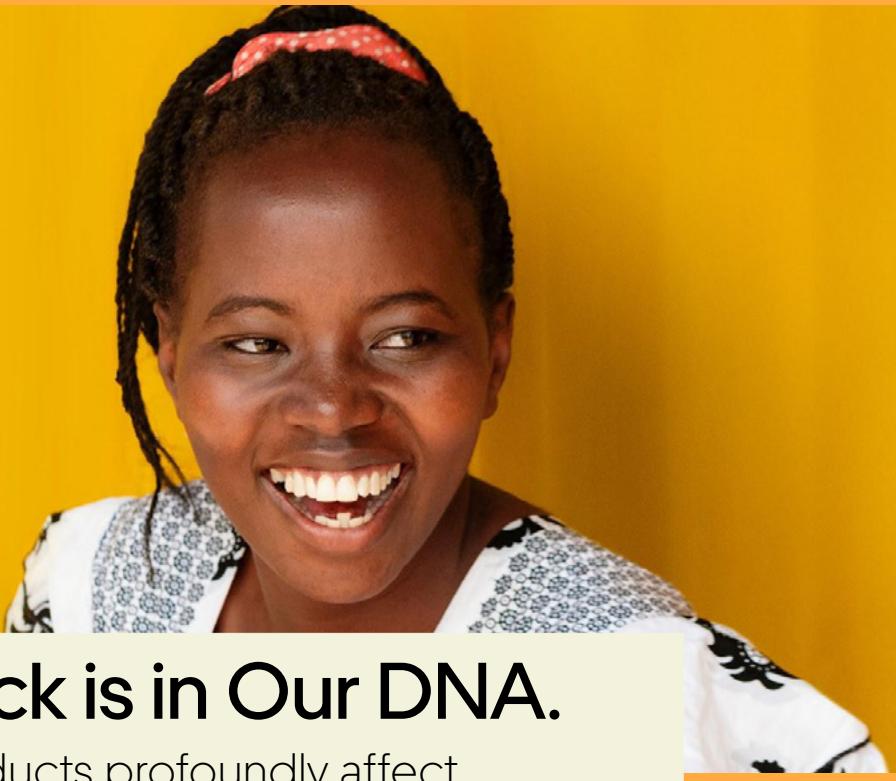
Uber prohibits retaliation against an employee for reporting concerns in good faith or for participating in an investigation. If you believe you are being treated negatively for reporting concerns or participating in an investigation, please inform your manager or the HR Team via [Ask HR](#). You can also report your concern to the [Integrity Helpline](#).

Managers are responsible for creating an open and supportive environment in which their teams feel comfortable raising concerns and questions. It should also be a place where employees build with heart. They can and should address certain workplace issues, such as performance concerns, minor behavioral issues, or low levels of interpersonal conflict. But [ethical or misconduct matters](#) need to be escalated by the manager to the appropriate Uber team. Whether managers observe such concerning behavior directly, or the behavior/matter is raised by an employee, they have a duty to [report to HR](#) and/or the [Integrity Helpline](#).

Uber's culture of inclusion and respect extends to its compensation practices. We are committed to pay equity, and we regularly review our pay practices, as well as our employees' pay, to support equal pay for equal work, regardless of gender or race.

Our [Global Employee Handbook](#) guides us towards our common values and reinforces Uber's philosophy, behaviors, and culture. Please read the Handbook in its entirety together with your applicable country annex to understand local laws and your workplace's specific policies.





## Giving Back is in Our DNA.

At Uber, our products profoundly affect lives, and we care deeply about our impact.

Our Social Impact team identifies projects and opportunities to further Uber's mission by supporting Sustainability, Safety, Economic Empowerment and Equity projects.

We participate in many humanitarian and charitable endeavors that are aligned with the business for positive social impact. That participation ranges from the use of the Uber platform for social good via partnerships (e.g. Uber's free deliveries after natural disasters) to cash contributions to donations of Uber resources. These are Uber-sanctioned endeavors. You should not use Uber's name or branding resources for anything that is not Uber-sanctioned.

When you are deciding where to give your time or funds, be sure to separate your personal community activities from your work. Pursue community activities on your own time, with your own resources, as an individual private citizen, and not as a representative of Uber. Do not claim to represent, or imply representation of, Uber to the public or in any public process or forum, unless specifically requested to do so by management. And never contribute to a charitable organization or cause in exchange for obtaining business or other potential advantages for Uber.

When working on charitable endeavors for Uber, remember that charitable giving can pose risks to the company if conducted with questionable beneficiaries or if provided for improper purposes. Therefore make sure you review and follow the [Conflicts of Interest Policy](#) and the [Policy Against Bribery and Corruption](#).



## Working with Reputable Partners

Third parties play an important role in helping us conduct our business ethically.

Our third party partners help us grow our business more efficiently than otherwise might be possible. However, they present a significant risk to Uber if they do not act ethically or have a questionable reputation. For this reason, Uber evaluates its third parties and requires them to agree to conduct themselves according to an appropriate standard of conduct. Uber employees who work with third party partners must monitor their partners, know the signs of a third party acting unethically, and notify E&C when there are concerns.

Here are some of the steps we take to minimize the risks presented by third parties:

- Ensure suppliers or other third parties are reputable and qualified;
- Ensure that the hiring of a supplier or other third party does not create an actual or apparent conflict of interest;
- Ensure that suppliers and other third parties conduct business on behalf of Uber in accordance with our [Supplier Code of Conduct](#); and
- Evaluate and approve suppliers and other third parties for data security and privacy risks (TPRM) and in accordance with our third party due diligence program (anti-bribery), including obtaining management and E&C approval where appropriate.



## Building an Equitable and Sustainable Future

We believe that sustainability is integral to the success of Uber's business.

Uber's Environmental, Social and Governance (ESG) vision is the seamless integration of ESG principles into business decision-making to promote long-term value for our stakeholders. This vision is supported by Uber's cultural values, our policies and procedures, and, most importantly, through the day-to-day actions of our employees.

We strive to uphold internationally-recognized human rights principles in all our operations, including the United Nations Universal Declaration of Human Rights, and to operate in compliance with human rights laws and regulations wherever we have operations. We believe that all human beings around the world should be treated with dignity, fairness, and respect, and that everyone should have the right to move freely, safely and without fear. Uber does not use or condone the use of child or involuntary labor or human trafficking and denounces any degrading treatment of individuals or unsafe working conditions. Further information can be found in our [Human Rights Policy](#).

Our [Environmental Policy](#) is among the key documents outlining the Company's approach to sustainability and the requirements and expectations of employees as we work together to define new and better ways to work, transition to a low carbon economy, and build a world that is better, safer and more equitable. See our annual [ESG Report](#) for more.

# Telling Our Story - Responsibly and Respectfully

Uber has a positive impact on communities throughout the world.

The Policy and Communications team works with press, community leaders and policy makers to tell that story. They have tools and guidance on how to effectively engage with the press.



# Communicating with the Media

The Policy & Communications Team should be involved for all media requests and inquiries.

No one should speak to the press without first receiving permission from the Uber communications team in writing or via the [Speaker's Bureau](#).

Uber is a high-profile company and, from time to time, employees may be approached by reporters and other members of the media. In order to ensure that we speak with one voice and provide accurate information, you should direct all media inquiries to [press@uber.com](mailto:press@uber.com).

## Using Social Media

Social media has the potential to affect Uber's reputation. Use it wisely.

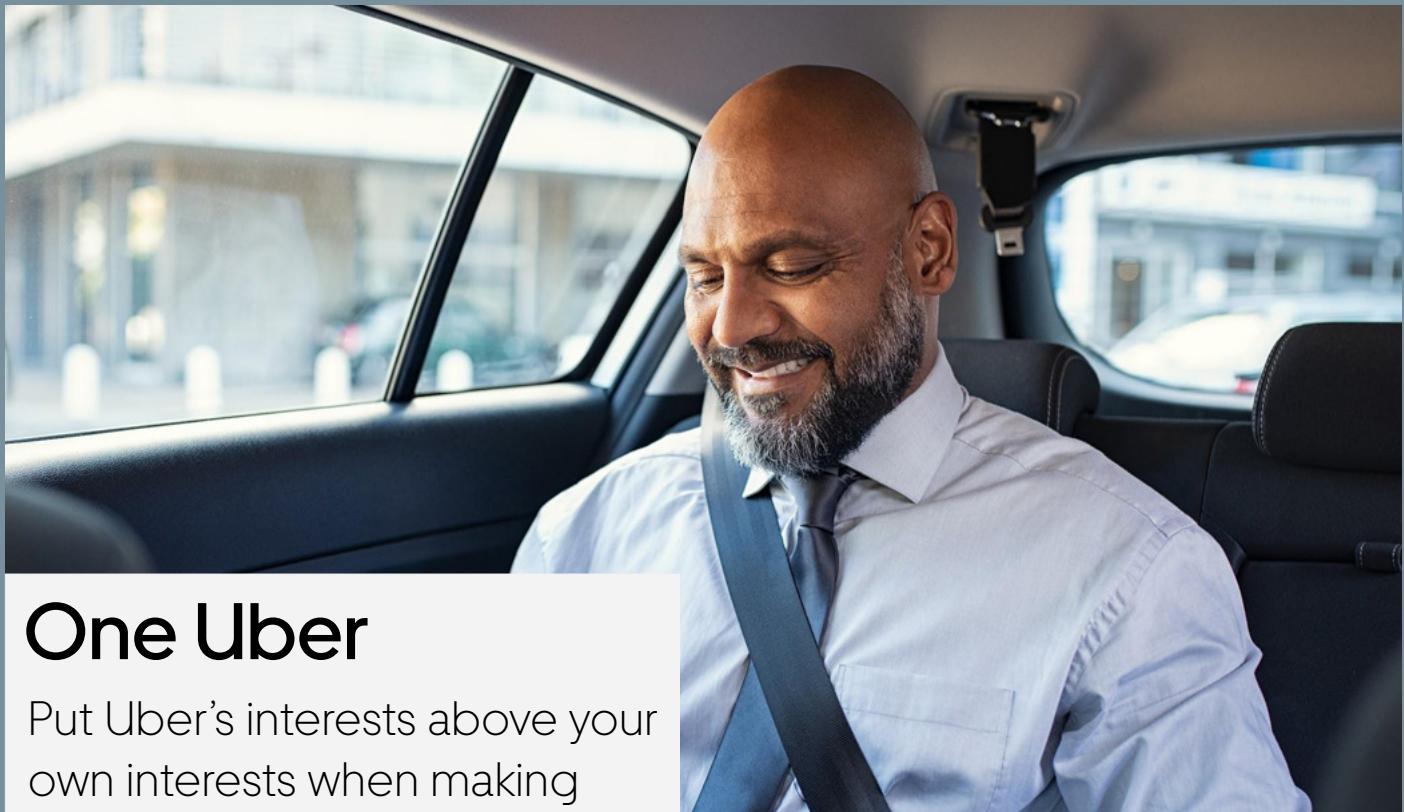
Social media provides unique opportunities to share stories about our business and to listen, learn and engage with users and communities. However, use of social media also presents certain risks and carries with it certain responsibilities. Employees are personally responsible for familiarizing themselves and complying with the Social Media section of our [Global Employee Handbook](#) and our [Social Media Policy and Guidelines](#).

# Conflicts of Interest, Insider Trading & Government Relations

Uber does not buy market access, business, or policy outcomes with money, gifts, or other perks.

Our continued success depends on building good relationships with customers, shareholders and governments.

**We do the right thing. Period.**



## One Uber

Put Uber's interests above your own interests when making business decisions.

At times, we may be faced with situations where the actions we take may present, or create the appearance of, a conflict between our interests and Uber's interests. These conflicts can exist when our private interests, including personal, family, social or financial interests, interfere in any way with the performance of our Uber responsibilities. This issue could come up because the course of action that is best for us personally may not also be the best course of action for Uber. We owe a duty to Uber to advance its legitimate interests. We should work together to do what's best for Uber, not the individual or team.

Determining whether a conflict of interest exists is not always easy. Even the appearance of a conflict can look bad and should be avoided. Employees seeking guidance should review the [Conflicts of Interest Policy](#) and [resources](#). Employees with a question regarding a conflict of interest should contact their [E&C Regional Director](#) or [E&C](#). Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must notify their direct manager and seek review by completing the [Conflict of Interest Disclosure Form](#). Once the form is submitted, the appropriate E&C team member will reach out to you with next steps. Over your time at Uber, you should let E&C know if anything has substantially changed from your original form submission.

Here are examples of activities that may present conflicts of interest that you must discuss with your manager and for which you must obtain approval from E&C via [Disclosure](#):

**Financial Interests.** You should not have a financial interest in any entity that competes or does business with Uber; ownership of up to 1% of an entity with publicly traded securities is generally okay.

**Outside Activities by Personnel.** You should not engage in outside activity that (i) is competitive with Uber, or (ii) affects your ability to devote appropriate time and attention to your job responsibilities.

**Family and Close Personal Relations.** You must not attempt to influence any Company-related decision including hiring or business dealings that may benefit or appear to benefit an immediate family member or close personal relative or an entity in which such individual is involved or has a financial interest.

**Gifts, meals and other items of value.** You must never accept or provide gifts or other items of value, borrow money or perform or receive other favors that might compromise or appear to compromise your ability to make objective and fair business decisions or might influence or appear to influence business relationships. [See Policy for limited exceptions (e.g., gifts valued at less than US\$150)].

**Corporate Opportunities.** You may not take advantage of any business opportunity that is discovered through your work at Uber unless the opportunity is disclosed fully in writing and approved as described in this Policy.



## Insider Trading

Do not use information obtained while working for Uber to trade securities.

During the course of your relationship with Uber, you may receive material non-public information regarding Uber or other companies. Many countries in which we operate, including the U.S., have insider trading laws that restrict any trading of securities and other similar activities by anyone who is aware of material non-public information. Material non-public information is information not generally known to the public that a reasonable investor may consider important when considering whether to buy or sell securities in a company.

As a general matter, any employee who is aware of material non-public information regarding Uber or any other company may not trade in that company's securities. Employees are also prohibited from passing along such information to others who may use it to trade in that company's securities.

Our Insider Trading Policy [page](#) has important information and details regarding these restrictions, including information on company-wide trading windows and blackout periods, helpful FAQs and training. If you are not certain whether a proposed transaction complies with Uber's [Insider Trading Policy](#), you should contact [Trading Compliance](#).



## Receiving Gifts & Business Entertainment

Employees may accept modest, unsolicited gifts and business entertainment, but never money or gift cards.

We should avoid any actions that create a perception that Uber provides favorable treatment to outside entities in exchange for business courtesies such as gifts, gratuities, meals, hospitality, entertainment or other benefits.

However, employees may accept unsolicited business courtesies of modest value that promote successful working relationships and goodwill with our business partners. Be transparent.

Employees who award business or who can influence the allocation of business must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the company's reputation for impartiality and fair dealing.

In general, you may not accept business courtesies valued at more than US\$150 without consultation and approval from E&C. Local legal restrictions may impose lower limits. Please seek guidance from your [E&C Regional Director](#) or [E&C](#) and review the [Policy against Bribery and Corruption](#).

Employees may accept:

-  Flowers
-  Food and drink (such as wine, chocolates, edible arrangements)
-  Gifts of a modest value that mark a special occasion, like closing a deal
-  Gifts of a modest value, like shirts, hats, water bottles and other swag
-  Meals or entertainment that are shared with the person who has offered to pay so long as they are reasonable and infrequent

Employees may not accept:

-  Cash or cash equivalents (such as gift cards)
-  Expensive gifts including sports and entertainment tickets unless you have obtained E&C pre-approval
-  Any gifts from a vendor or supplier while negotiating a contract or a deal with them

Employees requesting E&C pre-approval to accept business courtesies should fill out the business courtesy pre-approval [form](#). For general questions, please contact [E&C](#).



## Giving Gifts & Business Entertainment

Employees may give modest gifts, but not to gain an unfair business advantage.

We may give modest gifts, branded swag, hospitality, meals, and entertainment, so long as we follow local laws and the recipient's internal policies. An employee may never use personal funds or resources to do something that cannot be done with Uber resources. We must account for business courtesies in accordance with approved company procedures and accurately enter them in Concur.

The same rules apply for both giving and receiving courtesies. To offer or give courtesies valued above US\$150, you should seek consultation and approval from E&C via the Informed360 disclosure [tool](#). Local restrictions may impose lower limits. Please seek guidance from your [E&C Regional Director](#) or [E&C](#) and review the [Policy against Bribery and Corruption](#). You also should seek guidance from the business partner receiving the courtesy since the policies of the recipient's company may be more restrictive. Special rules apply for gifts and courtesies to government officials, so check the next section for those rules.

Employees may give:

-  Company swag (like Uber branded shirts, hats, water bottles)
-  Modest gifts
-  Uber credits and promotional codes for Uber credits per the [Uber Credits Policy \(< US\\$50\)](#)
-  Reasonable meals or entertainment to discuss business

Employees may not give:

-  Cash or cash equivalents (with the exception of Uber gift cards)
-  Expensive gifts without E&C approval
-  More than US\$50 in Uber credits without management approval per the Uber Credits Policy
-  Paid travel without E&C approval

Employees requesting E&C pre-approval to give business courtesies should fill out the business courtesy pre-approval [form](#). For general questions, please contact [E&C](#).

# Special Rules for Interactions with Government Officials

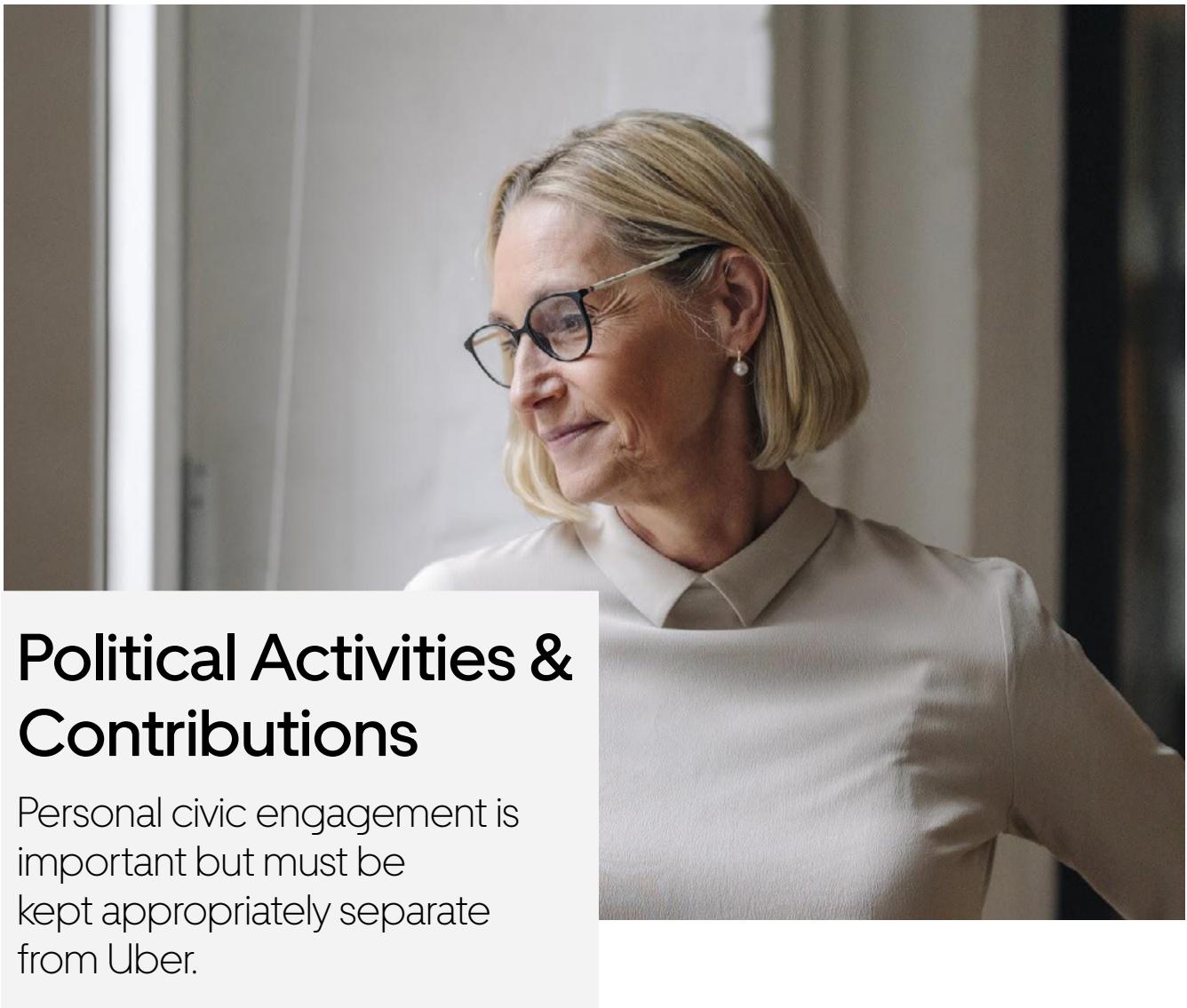
Be mindful of additional restrictions that apply to providing anything of value to a Government Official.

Global anti-corruption laws and Uber policy prohibit improper influence and giving anything of value, such as financial payments, gifts, travel, investments, service agreements, partnerships and political contributions to Government Officials and employees in exchange for business or policy outcomes. Uber policy also prohibits actions intended to interfere with official government enforcement activity. These laws and policies apply globally, not just in the United States, and cover not only Uber employees and contractors, but also third parties we retain, such as consultants and lobbyists.

Uber's [Policy against Bribery and Corruption](#) explains how to interact with government agencies and officials, including when retaining third parties who interact with the government on our behalf. In some circumstances, hiring a close relative of a Government Official as an employee could be interpreted as providing a benefit in exchange for a favorable government decision.

The [Global Policy for Hiring Relatives of Government Officials](#) describes how to consider and potentially hire close relatives of Government Officials in compliance with legal requirements. [Uber's Corporate Policy on our Applications and Government Employees](#) explains permitted and prohibited uses of our applications and practices relative to Government Officials.

Finally, [Policy on Interaction with Public Officials - U.S.](#) explains when interactions with U.S. government officials or employees could be considered lobbying. In some U.S. jurisdictions, you must first register as a lobbyist before engaging in any lobbying activity, so it is important that employees obtain pre-approval from the [U.S. Political Law Team](#) before engaging in any conduct that could be considered lobbying. In EMEA, there is the [Policy on Interaction with Public Officials - EMEA](#) to guide interactions in that region.



## Political Activities & Contributions

Personal civic engagement is important but must be kept appropriately separate from Uber.

You may support the political process through personal contributions or by volunteering your personal time to the candidates or organizations of your choice. However, you may not conduct these activities on company time or use any company resources. If you decide to express a personal view in a public forum (such as a letter to the newspaper), do not use Uber letterhead, company email, or reference your business title or address. You also may not make or commit to making political contributions on behalf of Uber.

The [Policy on Employee Political Activity - U.S.](#) requires certain employees to obtain pre-approval from the Political Law team before they or their immediate family members make or solicit personal political contributions in the United States.

A close-up, profile shot of a woman with dark, curly hair looking out of a car window. She is smiling slightly and has a thoughtful expression. The interior of the car is visible, including the headrest and window frame.

## Competing Fairly

We compete fiercely and fairly and on the merits.

At Uber, we believe in doing the right thing. We make every effort to abide by the antitrust and competition laws of all countries where we do business.

# Competitors & Fair Trade Practices

We support fair competition and free access to markets.

Antitrust and competition laws around the world are designed to promote fair competition. They prohibit collusion among competitors (for example, agreement on prices, discounts, incentives, or geographic allocation or exchanging commercially sensitive information) as well as conduct that results in an unjustified “monopoly” or “dominant” position.

Uber’s [Policy on Antitrust and Competition Law](#) requires compliance with the antitrust and competition laws of all countries in which we operate, whether we are interacting with others or acting on our own. Notably:

- Uber employees should generally avoid communicating with Uber’s actual or potential competitors, and must never communicate or agree with actual or potential competitors about commercially sensitive matters.
- Uber employees should not strive to “monopolize,” “dominate” or “control” markets; to exclude rivals from access to customers, suppliers, inputs or partners; or to engage in predatory or excessive pricing practices that would harm customers or competitors.

Because of the complexity of antitrust and competition laws and the potential legal consequences of violating them (including large fines and criminal penalties), Uber employees must consult the [Competition](#) team in Legal if they face a situation they believe may involve antitrust or competition law issues.

## Accurate Marketing

Our marketing, advertising and sales materials must be truthful, fair, non-misleading and supported by reliable evidence.

Any claims we make about Uber, our products or services, and even our competitors, must be truthful, fair, non-misleading, and substantiated. We cannot omit key facts or conditions. Instead, we must be straightforward in how we present ourselves and our platform-- relying on data or other evidence to back-up our claims. There are laws which strictly prohibit deceptive or unfair advertising and practices, and such practices are also inconsistent with our policies.



# Competitive Intelligence

We may only gain information about our competitors from appropriate sources.

Gathering information about our competitors, often called competitive intelligence, is a legitimate business practice. It helps us stay competitive in the marketplace. However, we must never use any illegal or unethical means to get information about other companies. Uber's [Competitive Intelligence Policy](#) explains which practices are permitted for gathering competitive intelligence, including obtaining publicly available news accounts and industry surveys. The Policy also identifies practices that are prohibited, such as obtaining information by fraud or misrepresentation. These rules also apply to the consultants, vendors, and other partners whom we hire. If you have questions, please review the Competitive Intelligence Policy [page](#) for FAQs and other helpful resources and contact [E&C](#).



## Protecting Uber's Information and Assets

At Uber, we have a lot of important assets to protect, including our business confidential information, our users' and employees' data, company equipment, and intellectual property.



## Uber's Confidential Information

One of our most important assets is our confidential information.

Employees who have received or have access to confidential information must take care to keep this information confidential. You should take the approach that anything not known outside of Uber is valuable confidential information that cannot be shared outside Uber in any forum without explicit authorization from Legal.

Sharing confidential information outside Uber could expose it to competitors, jeopardize our business, and threaten or destroy our ability under the law to protect such information. Similarly, you should not bring confidential information from other companies to Uber when you arrive nor should you take Uber confidential information when you leave. Examples of such confidential information include Uber data, user data, business practices, content discussed in All Hands and staff meetings, source code, algorithms, software, etc.

# User Personal Information

Be a responsible data steward.

Users trust us with their personal information. Our [Internal Privacy Policy](#) discusses privacy at Uber, including our privacy principles:



We do the right thing with data



We build privacy into our products from start to finish



We collect and use data for specific, approved, and lawful purposes, and only the amount we need



We are transparent about how we collect, use, and share data



We give users choices about their data



We safeguard personal data

In addition, our [User Privacy Notice](#) describes the personal data we collect, how it's used and shared, and user choices regarding this data. To comply with our Privacy Principles and our User Privacy Notice, employees collecting or using personal information must make sure their collection and use has received a [privacy review](#).

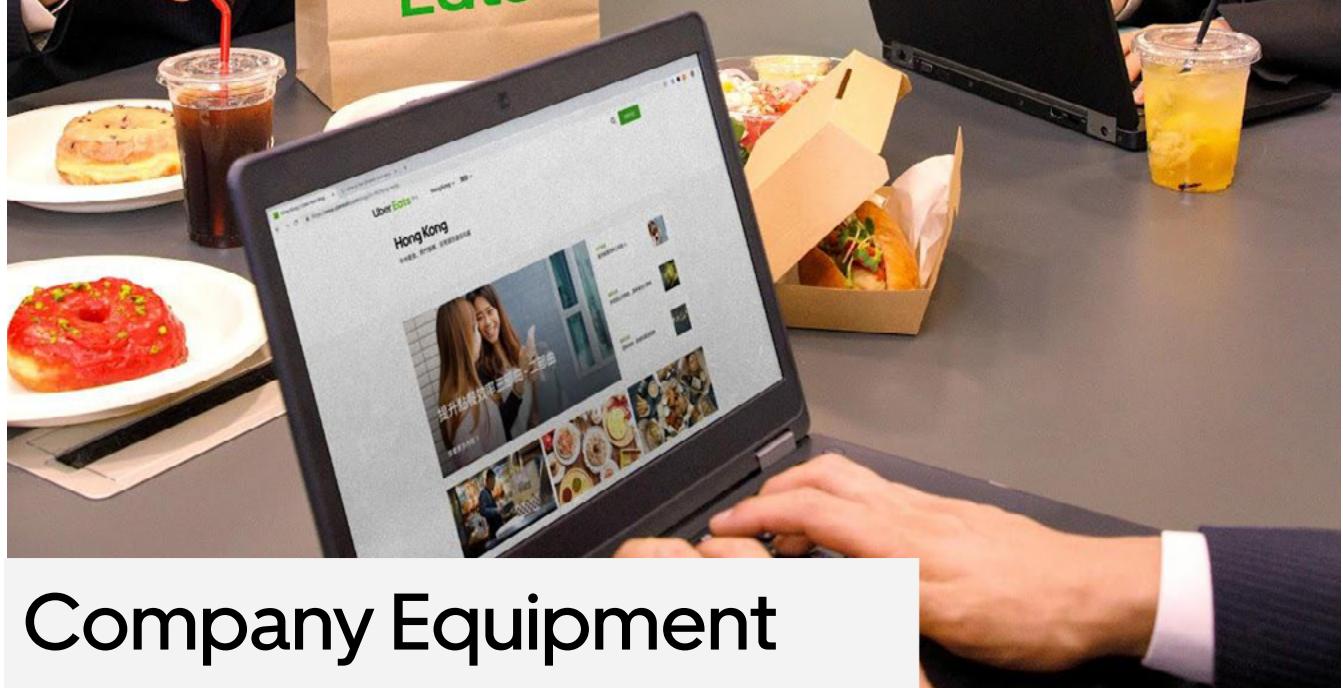
Uber's [Data Access Policy](#) and [Network & Device Acceptable Use Policy](#) prohibit employees from accessing others' personal information without a legitimate business purpose tied to the employee's role and responsibilities.

# Employee Personal Information

Our employees' privacy is as important as users' privacy.

Uber's [Employee Privacy Notice](#) describes the data that Uber may collect in connection with your employment, and how that information may be accessed, used, transferred and disclosed.





## Company Equipment

Use Uber's equipment for Uber business.

Uber's assets, including computers, phones, email and information, are meant to be used for the benefit of the company. These assets are not to be used for personal gain or for the benefit of others outside of Uber. It is your responsibility to keep Uber's assets safe from loss, theft, damage, or fraud (which includes inappropriate use). Your use of Uber's assets is subject to the [Employee Privacy Notice](#) and the [Network & Device Acceptable Use Policy](#).

# Protecting Uber's Intellectual Property (IP)

Uber's IP is one of our most important assets and is critical to the success of Uber.

Our IP strengthens our brand, protects competitive and commercial advantages, deters copying, promotes business deals, and enhances investor confidence in our business. It is protected under law via trademarks, copyrights, patents, and trade secrets. These laws cover Uber's trademarks, logos, branding, products, technology, algorithms, designs, software, hardware, APIs, code, proprietary data, processes, technical documentation and many other forms of Uber IP.

Consult with Uber's IP Team if you know about any proposed trademarks (whether it is the name or logo for a product or service or a marketing slogan), as well as any new innovations and creations, so that steps may be taken to clear and protect them. Uber takes the protection and enforcement of IP seriously, and it takes the infringement of its IP seriously as well. Infringement or a violation of Uber's IP rights will be strictly enforced.

## Respecting Third-party IP

At Uber, we not only take steps to protect our own IP, but we also respect the IP of other organizations and their respective efforts to protect such third-party IP.

Uber employees should not bring to Uber or use any third-party IP without explicit authorization from Legal. Violations could result in serious legal consequences for the Uber employee and the company. The IP Team should be consulted for any questions about third-party IP, or if anyone outside Uber contacts you about allegations of infringement of third-party IP.



# Contracting, Financial Reporting & Recordkeeping

We are transparent, honest and accurate when entering into contracts, disclosing financial information, and maintaining records. At Uber, we do the right thing. Period.



## Contracts & Trade Compliance

We follow procurement and trade compliance laws.

Our [Global Procurement Policy](#) provides guidelines and establishes procedures for all Uber employees in any situation where they are involved in a purchasing process. In addition, as a federal contractor, Uber must follow certain government procurement rules related to ethics and business conduct. You are expected to know and comply with all government procurement rules applicable to our business as violations of these federal regulations could result in fines, penalties, and major loss of business for Uber.

Uber is committed to complying with global import and export laws and regulations that impact with whom we can do business (People), where we operate (Places) and the transfer of sensitive technologies (Products).

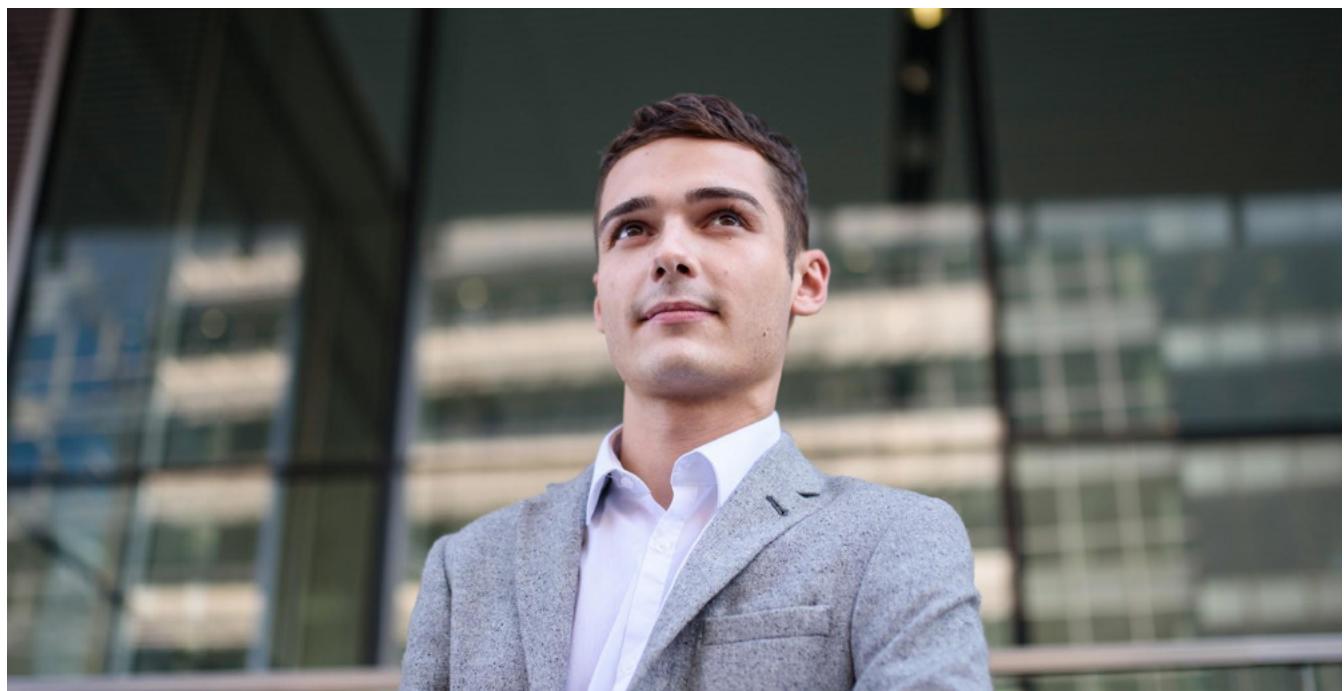
**People.** Our systems and processes including background check requirements have been designed to allow Uber to meet our regulatory obligations when making payments to users and suppliers, as well as hiring employees and contingent workers.

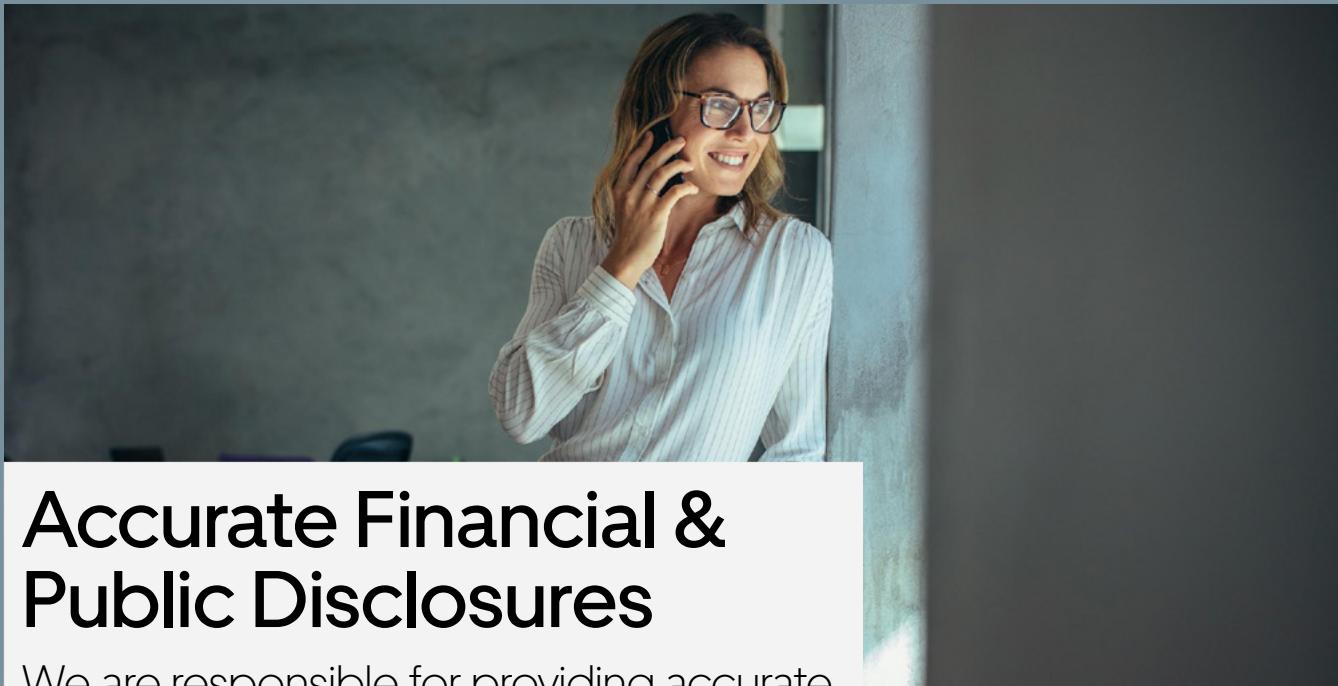
**Places.** We currently are prohibited from operating in Cuba, Iran, North Korea, Sudan, Syria and the Crimea region of Ukraine without authorization from the U.S. government. Contact [E&C](#) if you want to explore doing business in or with individuals in these geographies to ensure we do so lawfully. Trade embargoes and sanctions regulations are in flux for other high-risk geographies including the People's Republic of China, Hong Kong, Russia, and Venezuela; please contact the E&C team for policy and strategy support regarding any potential business in these geographies.

**Products.** Sensitive and highly controlled technologies, such as strong encryption and telecommunications may require licenses for import and export (including global releases). If you are involved in these activities, you are responsible for knowing and following these laws. All Uber-owned products moving across international borders or being released outside of the U.S. must do so in compliance with the relevant countries' applicable import and export controls, including proper licensing, accurate classification and payment of any applicable duties or tariffs. All shipping of Uber-owned assets and hardware should go through Oracle OTM/GTM for proper tracking and customs clearance. Uber partners with trusted third party service providers to move our goods and act as customs brokers on our behalf to support the global scope of our fast-paced business. Please direct any questions regarding freight forwarding, customs brokerage, or powers of attorney related to import/export matters to [Import Compliance](#) and [Logistics Escalations](#).

We do not cooperate with foreign boycotts that are not approved by the U.S. government. If you receive a request related to any boycott, promptly contact [E&C](#) and do not respond to the request.

Money laundering is conduct designed to disguise proceeds of criminal activity by individuals or entities. We forbid knowingly engaging in transactions that facilitate money laundering or result in unlawful diversion.





## Accurate Financial & Public Disclosures

We are responsible for providing accurate, complete and clear information about our business.

We are responsible for ensuring that financial reports, public filings and other key reporting and disclosures meet legal requirements and applicable standards. Investors and regulators count on us to provide accurate information to make informed decisions.

It is also your responsibility to be transparent and cooperative with and provide complete and accurate information to Internal Audit or to outside auditors regarding any audit or review of our company's financial and non-financial statements and key disclosures.

Concerns regarding financial and non-financial reporting and disclosures, internal controls, or auditing matters should be promptly reported through the [Uber Integrity Helpline](#) or to Internal Audit, E&C or a manager you trust who can report your concern through the Integrity Helpline by proxy. Reports through the Helpline may be made anonymously in most regions and will be handled in a confidential manner.



## Corporate Recordkeeping and Information Governance

Our records make up our corporate memory and contain information critical to the continuity of our business.

Proper recordkeeping and information governance requires that Uber keep accurate and timely records for business, financial and legal reasons. Uber securely maintains data for the duration of the retention period set forth in the appropriate retention schedule as defined by its information governance and document retention [policies](#). From time to time, records must be kept longer for legal reasons, and you may be required to comply with the Legal Hold process upon notification from Legal.

At the expiration of the Retention Period or Legal Hold, data may be deleted or destroyed through an automated or manual process.

# Code of Ethics for Directors

Our directors, officers and employees must comply with the Code of Ethics.

This Business Conduct Guide applies in its entirety to all of Uber's members of the Board of Directors, officers and employees. However, only the following sections constitute the Code of Ethics for the purposes of the rules of the SEC and the listing standards of the New York Stock Exchange: Stand Up/Speak Up, Great Minds Don't Think Alike, Giving Back, Working with Reputable Partners, Building an Equitable and Sustainable Future; Telling Our Story - Responsibly and Respectfully; Conflicts of Interest, Insider Trading & Government Relations; Competing Fairly; Protecting Uber's Information & Assets; and Contracting, Financial Reporting and Recordkeeping. Additionally, Directors, officers and employees must not take for themselves opportunities related to Uber's business; use the Company's property, information, or position for personal gain; or compete with the Company for business opportunities. Sections listed include any subsections contained therein. All sections not listed above, as well as all sidebars, Q&A's, examples, and linked policies or documents, are not included in the Code of Ethics.